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December 4, 2019

ADMITTED IN
NY, NJ, PA, IL, DC

VIA ECF

Hon. Alison J. Nathan, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: **Vasquez, et al. v. NS Luxury Limousine Service, Ltd., et al.**
Case Number 18-cv-10219 (AJN)

Dear Judge Nathan:

We represent plaintiffs Vasquez and Martinez in the above-referenced matter and write jointly with defendants' counsel, Karin Arrospide, Esq., pursuant to Your Honor's September 23 Order, to advise the Court that fact discovery is completed, and the parties are ready to schedule a post-discovery status conference, if the Court so desires. (We respectfully request that if a conference is scheduled for a Friday that it be conducted in the morning for Sabbath reasons.)

Alternatively, rather than conducting a conference at this time, plaintiffs respectfully request a briefing schedule for dispositive motions. As the Court may recall, while we are aware that Your Honor's preference is not to have summary judgment in non-jury cases, plaintiffs intend to move for summary judgment, with the Court's permission to do so. Plaintiffs maintain that the primary issue between the parties in this case turns not on factual disputes, but on legal questions relating to the applicability of wage-and-hour laws. Plaintiffs, therefore, respectfully suggest that summary judgment would be fruitful in this particular case in either completely resolving the matter or in significantly narrowing the issues for trial (or for facilitating renewed settlement discussions).

Defendants do not intend to move for summary judgment; however, defendants may cross-move for summary judgment should Your Honor allow plaintiffs to move for summary judgment.

We thank the Court for its attention to these matters. We are available at Your Honor's convenience in the event that the Court has any questions.

Hon. Alison J. Nathan, U.S.D.J.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Stein", written in a cursive style.

David Stein

cc: Karin Arospide, Esq. (via ECF)